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McKinley & Ryan  
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United States

Billed To Carolyn Gardner	Date of Issue 02/04/2025	Invoice Number 159-PWK	Amount Due (USD) <b>\$829,600.00</b>
	Due Date 02/19/2025		

Description	Rate	Qty	Line Total
Telephone Call 12/16/21 - Telephone call with Client re: intake issues	\$850.00	0.3	\$255.00
Initial Consultation 12/17/21 - Initial consultation	\$850.00	1.7	\$1,445.00
Email 12/21/21 - Email to opposing counsel/AG and Client	\$850.00	0.3	\$255.00
Review/Email 12/27/21 - Review client documents and email to client re: strategy for RA claim	\$850.00	0.6	\$510.00
Telephone Call 1/5/22 - Telephone call with Client re: IAP and new documents	\$850.00	0.4	\$340.00
Telephone Call 1/6/22 - Telephone call with Client re: IAP	\$850.00	0.6	\$510.00
Emails 1/7/22 - Emails to Client re: status for RA and prep for IAP	\$850.00	0.4	\$340.00
Telephone Call 1/10/22 - Telephone call with Client re: IAP	\$850.00	0.7	\$595.00
Prepare 1/13/22 - Prepared case issues (1.8); Prepare outline for demand letter (.5)	\$850.00	2.3	\$1,955.00

Prepre/Review/Revise/Edit 1/14/22 - Prepare, review, revise, edit demand letter/proposed resolution (4.8); Telephone calls with Client re: proposed revisions and legal options (.9)	\$850.00	5.7	\$4,845.00
Email 1/19/22 - Email to Client re: Response from PASSHE Atty and next steps	\$850.00	0.3	\$255.00
Telephone Call/Email 1/20/22 - Telephone call with Client re: response from PASSHE and next steps (1.4); Email to Counsel re: RA and settlement (.5)	\$850.00	1.9	\$1,615.00
Emails 1/21/22 - Emails to Client re: Grievances and inter-related CBA issues	\$850.00	0	\$0.00
Telephone Calls 1/22/22 - Telephone call with Counsel re: RAs and resolution (.3); Telephone calls with Client re: status of accommodations (1.4)	\$850.00	1.7	\$1,445.00
Emails 1/24/22 - Emails to Counsel re: status of RAs (.2); Emails to Client re: same (.2)	\$850.00	0.4	\$340.00
Emails 1/26/22 - Emails w/ Client and PASSHE counsel re: RA issues	\$850.00	0.3	\$255.00
Emails 1/28/22 - Emails to Client re: PASSHE denial of RA	\$850.00	0.2	\$170.00
Email 2/1/22 - Email to PASSHE Counsel re: responses to RA rejection	\$850.00	0.1	\$85.00
Telephone Call/Zoom Meeting/Consult 2/2/22 - Telephone call with Client re: status of IAP and FMLA (1.2); Zoom meeting with outside counsel re: litigation planning and damages issues (1.2); Legal consults w/ NELA colleagues re: litigation planning (1.2)	\$850.00	3.6	\$3,060.00
Telephone Call/Prepare 2/25/22 - Telephone call with Client re: complaint status and legal issues (.9); Initial outline for Federal Court Complaint (1.5)	\$850.00	2.4	\$2,040.00
Prepre/Review/Revise/Edit 3/9/22 - Prepare, review, revise and edit Federal Complaint	\$850.00	4.5	\$3,825.00
Telephone Call 3/10/22 - Telephone call with Client re: Federal Complaint	\$850.00	1	\$850.00
Review/Revise/Edit 3/15/22 - Review, revise, edit Federal Complaint	\$850.00	5	\$4,250.00
Prepre/Review/Revise/Edit/Email 3/16/22 - Prepare, review, revise, edit Federal Complaint and Email to RL re: Fed Comp and Edits	\$850.00	9.5	\$8,075.00

Telephone Calls/Review/Revise/Edit 3/17/22 - Telephone call with Co-Counsel re: Federal Complaint (.5); Review, revise, edit Federal Complaint and prepare for filing (6.2); Telephone calls with client re: revisions to Federal Complaint (.7)	\$850.00	7.4	\$6,290.00
Prepare 3/18/22 - Prepare service documents and correspondence to Counsel and Client	\$850.00	0.5	\$425.00
Prepare 3/21/22 - Prepare service packages (.5 N/C); Emails to RL re: Service and PASSHE Conflict and prep for status conference (.3)	\$850.00	0.3	\$255.00
Review/Revise/Edit 3/23/22 - Review, Revise, Edit Fall RA; Email to Client re: same	\$850.00	0.3	\$255.00
Review/Revise/Edit/Email 3/29/22 - Review, revise, edit RA request for fall; Email to Client re: same	\$850.00	0.3	\$255.00
Telephone Call 4/7/22 - Telephone call with Client re: case status, discovery planning and settlement strategy	\$850.00	1.6	\$1,360.00
Prepare/Emails 4/13/22 - Prepare SED's and planning; Emails to client re: same	\$850.00	1.3	\$1,105.00
Email/Correspondence/Telephone Call 4/15/22 - Email w/ Client and RL re: DSO demand for add'l medical info for RA request (1.4); Telephone call w/ RL re: DSO email and next steps (.4)	\$850.00	1.8	\$1,530.00
Email/Correspondence/Prepare/Telephone Call 4/18/22 - Email w/ Client & RL re: Strategy for responding to DSO email on 4/15/22 (1.3); Prepare draft SED's (1.4); Telephone call w/ RL re: same (.4)	\$850.00	3.1	\$2,635.00
Prepare/Telephone Call 4/19/22 - Prepare SED production and related correspondence to counsel & client (3.8); Telephone calls w/ RL and Client re: SED's (.1)	\$850.00	3.9	\$3,315.00
Emails/Zoom Conference/Witness Interview 4/20/22 - Emails w/ Client and RL re: strategies for response to DSO and notice to counsel (.4); Zoom conference/witness interview (1.0); Emails w/ Client and RL re: finalization of DSO response and attach- ments (.4)	\$850.00	1.8	\$1,530.00
Review/Revise/Edit 4/22/22 - Review, revise, edit email to DSO	\$850.00	0.1	\$85.00
Email 4/26/22 - Email to Counsel re: DSO letter and attachments	\$850.00	0.4	\$340.00
Email 5/16/22 - Email to Client re: service/answer/next steps	\$850.00	0.3	\$255.00

Email 5/16/22 - Email to Client re: Answer due date and next steps	\$850.00	0.2	\$170.00
Email 5/24/22 - Email to Counsel re: service issues/waiver/answer	\$850.00	0.2	\$170.00
Telephone Call 5/26/22 - Telephone call with Client re: case status and next steps	\$850.00	1.5	\$1,275.00
Telephone Call/Emails 6/1/22 - Emails to Counsel, Co-Counsel, Client and KH dep re: waiver and answer (.3); Telephone call with Atty Lamar re: same (.1)	\$850.00	0.4	\$340.00
Email 6/3/22 - Email to Counsel re: request for waiver and answer	\$850.00	0.1	\$85.00
Review/Annotate 6/14/22 - Review/Annotate Complaint/Answer (.8); Email to client re: defense analysis and witness selection for depositions (.3)	\$850.00	1.1	\$935.00
Emails/Correspondence 6/15/22 - Emails to Client re: mediation schedule/prep and discovery needs	\$850.00	0.6	\$510.00
Email 6/22/22 - Email to RL re: Settlement history docs and strategy	\$850.00	0.3	\$255.00
Telephone Call 6/23/22 - Telephone call with RL re: Settlement	\$850.00	0.5	\$425.00
Attend 6/24/22 - Attend Zoom Meeting with Client and Atty Lamar re: status and moving forward	\$850.00	2	\$1,700.00
Email/Correspondence/Telephone Call 7/19/22 - Email to Client and RL re: discovery and mediation prep (.2); Telephone call with RL re: same (.1)	\$850.00	0.3	\$255.00
Emails 7/20/22 - Emails to Client re: back pay calculation; Email to Counsel re: demand letter	\$850.00	0.3	\$255.00
Prepare/Review 7/21/22 - Prepare initial demand letter and review corresponding documents	\$850.00	3.1	\$2,635.00
Telephone Call/Review/Revise/Edit/Correspondence 7/22/22 - Telephone call with Client and Atty Lamar re: demand letter and mediation (1.1); Review, revise, edit demand letter (.6); Prepare letter to Judge re: Rule 16 conference (.2)	\$850.00	1.9	\$1,615.00
Prepre 7/26/22 - Prepare mediation memorandum	\$850.00	2.2	\$1,870.00
Telephone Calls/Review/Revise/Edit	\$850.00	2.7	\$2,295.00

7/27/22 - Telephone calls with Client and Co-Counsel re: mediation memorandum and mediation preparation (1.3); Review/Revise/Edit Mediation Memo (1.2) Telephone call with RL re: mediation memorandum and prepare for telephone call with Court (.2)

Telephone Call 7/28/22 - Telephone call with RL re: mediation prep	\$850.00	1	\$850.00
Conference Call 8/3/22 - Conference call with Client re: mediation preparation	\$850.00	1.3	\$1,105.00
Telephone Calls/Attend 8/4/22 - Telephone calls with Client and Atty Lamar re: mediation preparation and recap (.7); Attend Mediation (2.5)	\$850.00	3.2	\$2,720.00
Prepare 8/5/22 - Prepare TRO	\$850.00	5	\$4,250.00
Telephone Call/Prepare/Attend/Email 8/8/22 - Telephone call with Client re: settlement issues and TRO (.8); Prepare draft Rule 26(f) Report (.4); Attend Rule 16 conference (.3); Prepare draft Plaintiff's 1st Request for Production of Documents and related file review (2.4); Email to RL re: conference report and discovery (.2)	\$850.00	4.1	\$3,485.00
Review/Telephone Call/Email 8/9/22 - Review Defendant's SED's & Discovery Production; Email to Client and RL re: same (.4); Review Rule 26(f) Report (.4); TRO Motion and related research (4.5); Telephone call with Judge Lloret re: settlement (.3)	\$850.00	5.6	\$4,760.00
Email/Telephone Call/Prepare/Research 8/10/22 - Email to Atty Lamar re: case planning (.4); Telephone call with Judge Lloret re: mediation follow-up (.3); Prepare updated chronology; email to Client re: TRO documents (1.4); Prepared Motion for TRO/Research (4.2); Emails to Client re: SED production questions (.3)	\$850.00	6.6	\$5,610.00
Email/Prepare/Review/Revise/Edit 8/11/22 - Email to Atty Lamar re: case planning (.4); Prepare, review, revise, edit Motion for TRO (2.0)	\$850.00	2.4	\$2,040.00
Prepare/Research/Email 8/15/22 - Prepare TRO and related research re: irreparable harm (10.4); Email to client re: status (.1)	\$850.00	10.5	\$8,925.00
Telephone Calls/Prepare/Review/Revise/Edit 8/16/22 - Telephone call with Judge Lloret re: settlement (.2); Prepare, review, revise, edit Motion for TRO (14.5); Telephone call w/ RL re: settlement and TRO prep (.2)	\$850.00	14.9	\$12,665.00
Telephone Call/Prepare 8/17/22 - Telephone call with Atty Lamar re: preparation for oral argument (.6); Prepare TRO Appendix (3.5); Prepare for TRO oral argument (2.5)	\$850.00	6.6	\$5,610.00
Prepare/Telephone Calls/Attend 8/18/22 - Prepared supplemental documents, production and updated chronology (1.3); Telephone calls with Atty Lamar re: oral argument	\$850.00	10.4	\$8,840.00

preparation and follow-up issues (.6); Prepare for oral argument (3.0); Attend oral argument re: TRO (.9); Prepare post-argument correspondence to Judge (2.8); Telephone call with Client re: TRO argument and post-argument process/substance/next steps (1.4)

Telephone Calls/Review 8/22/22 - Telephone call with Client re: TRO decision and next steps (.7); telephone call with Atty Lamar re: same and litigation schedule (.1); Review defendant's TRO response and court decision (.4)	\$850.00	0.8	\$680.00
Telephone Call 8/23/22 - Telephone call with Client re: discovery	\$850.00	0.5	\$425.00
Email/Telephone Calls 8/24/22 - Email to Counsel re: deadline re: RFA's (.2); Telephone call with Client re: ADA accommodation issues for fall (.5); Telephone call w/ RL re: same (.1)	\$850.00	0.8	\$680.00
Telephone Calls 9/22/22 - Telephone call with RL re: RFA's and other discovery matters (.2)	\$850.00	0.2	\$170.00
Email/Telephone Call 9/27/22 - Email to Client re: discovery status (.2); Prepare Notice of Martin deposition and related correspondence to Counsel and Client (.3); Telephone call with RL re: prep for status conference (.1); Attend status conference with Judge and preparation (.4)	\$850.00	1	\$850.00
Prepare/Telephone Calls 9/29/22 - Prepare for Martin deposition (3.8); Telephone call with Client re: recent status updates and prepare for depositions (1.2); Telephone call with RL re: same (.1)	\$850.00	5.1	\$4,335.00
Email/Telephone Calls/Prepare/Review/Revise/Edit/Attend 9/30/22 - Email to Client and Atty Lamar re: discovery issues (.8); Telephone call with Atty Lamar re: admissions and deposition summary (.7); Prepare for Martin deposition (.8); Review/Revise/Edit KU's document production and update chronology (1.8); Attend Martin deposition (2.0); Telephone call with Client re: deposition re: cap and KU's document production (1.1)	\$850.00	7.2	\$6,120.00
Email/Prepare 10/4/22 - Email to Atty Lamar re: FMLA/LWOP issues and strategy (.3); Prepare Notice of Depositions (Carroll and Provost) and related correspondence to Counsel and Client (.4)	\$850.00	0.7	\$595.00
Emails 10/20/22 - Emails to Client re: dep prep	\$850.00	0.3	\$255.00
Email/Telephone Call 10/24/22 - Email to Counsel re: depositions and discovery schedule (.2); Telephone call with Client re: deposition preparation and case status/strategy (.6)	\$850.00	0.8	\$680.00
Email 10/25/22 - Email to Counsel re: new appearances and discovery planning	\$850.00	0.3	\$255.00

Telephone Call 10/26/22 - Telephone call with client re: preparation for Carroll deposition	\$850.00	1.9	\$1,615.00
Prepare/Attend/Telephone Call 10/27/22 - Prepare for Anne Carroll deposition (.8); Attend Anne Carroll deposition (2.3); Telephone call with Client re: deposition recap and next steps (1.0)	\$850.00	4.1	\$3,485.00
Email 11/1/22 - Email to Atty Lamar re: discovery summary and planning	\$850.00	0.8	\$680.00
Attend 11/2/22 - Attend zoom meeting with Counsel re: discovery planning	\$850.00	0.4	\$340.00
Attend/Telephone Call 11/3/22 - Attend status conference with Court re: discovery plan (.5); Telephone call with Client re: conference call with court and next steps (.7)	\$850.00	1.2	\$1,020.00
Prepare 11/8/22 - Prepare deposition notices and related correspondence to counsel	\$850.00	0.4	\$340.00
Telephone Call 11/15/22 - Telephone call with RL re: discovery status	\$850.00	0.1	\$85.00
Emails/Review 11/18/22 - Email to Atty Lamar, Client and Counsel re: Chao deposition preparation (.2); Review release for medical records and email to counsel re: same (.4)	\$850.00	0.6	\$510.00
Telephone Call/Prepare/Review 11/21/22 - Telephone call with Client re: deposition preparation (1.4); Prepare for Chao deposition (5.2); Review scheduling stipulation and related correspondence to Counsel and Court (.3)	\$850.00	6.9	\$5,865.00
Telephone Call/Prepare/Meeting 11/22/22 - Telephone call with Client re: discovery/litigation issues (1.4); Prepare settlement update and related correspondence to Judge L. and Counsel (1.7); Conduct Chao deposition (1.5); Telephone call w/ RL re: discovery and updates to settlement demand (.5)	\$850.00	5.1	\$4,335.00
Email 11/23/22 - Email to RL re: KU's responses to RFAs	\$850.00	0.2	\$170.00
Prepare 11/30/22 - Prepare for Hollenbach deposition	\$850.00	3.2	\$2,720.00
Prepare/Meeting/Telephone Calls 12/1/22 - Prepare for Hollenbach deposition (3.6); Conducted Hollenbach deposition (1.3); Telephone call's with Atty Lamar and Client re: deposition, prep, recap and next steps (1.2)	\$850.00	6.1	\$5,185.00
Emails/Prepare/Review/Revise/Edit/Telephone Calls 12/5/22 - Email Draft to Judge Lloret re: settlement status (.6); Prepare, review, revise, edit Response to RFPD and prepare document produc-	\$850.00	6.4	\$5,440.00

tion (3.4); Telephone calls with client re: document production and LWOP letter/TRO process (1.6); Email correspondence to counsel re: confidentiality slip, medical release and LWOP letter

Prepare/Research/Email/Telephone Call 12/6/22 - Prepare sufficiency letter re: KU's response to RFA's and related research (1.9); Prepare for Provost deposition (1.8); Email to Counsel re: confidentiality slip and LWOP coord. with HR (.4); Telephone call w/ RL re: same (.1)	\$850.00	4.2	\$3,570.00
Email/Telephone Call/Prepare/Review/Revise/Edit 12/7/22 - Email to Client re: LWOP issues (.3); Prepare, review, revise, edit responses to KU's RFPD and corresponding doc. production (.5); Review add'l Client Docs (.6); Telephone call w/ RL re: same (.5)	\$850.00	1.9	\$1,615.00
Telephone call 12/13/22 - Telephone call w/ RL re: Doc production and discovery status/LWOP and TRO	\$850.00	0.3	\$255.00
Telephone Calls 12/15/22 - Telephone calls with Client re: LWOP, RA and TRO issues (.8); Telephone call w/ RL re: same (.3)	\$850.00	1.1	\$935.00
Telephone Call/Prepare Email 12/16/22 - Telephone call w/ RL re: LWOP status and next steps (.4); Prepare email to Counsel re: LWOP next steps status and compliance w/ documentation reg's for RA (.5); Telephone call with union re: TRO/CBA issues (.9); Email to client re: same (.2)	\$850.00	2	\$1,700.00
Email/Telephone Calls 12/17/22 - Email to Counsel re: DSO correspondence and TRO (.5); Telephone call with Client re: TRO issues (.9); Telephone call w/ Union re: LWOP status and options, Email to Client re: same (.5)	\$850.00	1.9	\$1,615.00
Emails/Telephone Calls/Prepare 12/21/22 - Review defendant document production; update chronology (.9); Email to client re: TRO/RA issues (.2); Telephone call with Kevin Bradford re: TRO and RA issues (.4); Prepare for Provost deposition (2.8); Telephone call with Client re: deposition preparation and issues re: LWOP status and TRO (1.1); Telephone calls with Atty Lamar re: same (.6); Email to KB re: proposal for resolving LWOP issue and Email to Client re: same (.5)	\$850.00	6.5	\$5,525.00
Telephone Call/Prepare/Attend 12/22/22 - Telephone call with Client re: Provost deposition and next steps (.4); Prepare for Provost deposition (3.0); Attend Provost deposition (2.0); Draft TRO/outline/update research (2.5); Telephone call w/ RL re: alternative RA (.5)	\$850.00	8.4	\$7,140.00
Prepare 12/23/22 - Prepare TRO Motion, Proposed Order and other filing documents	\$850.00	1.2	\$1,020.00
Prepare/Review/Revise/Edit 12/27/22 - Prepare, review, revise, edit TRO memo	\$850.00	7.2	\$6,120.00
Telephone Call/Review/Revise/Edit	\$850.00	3.9	\$3,315.00



12/28/22 - Telephone call with Atty Lamar re: TRO Motion and amendments (.1); Review, revise, edit, finalize 2nd TRO Motion (3.8)

Telephone Call 1/4/23 - Telephone call with Atty Lamar re: HR correspondence	\$850.00	0.3	\$255.00
Telephone Call 1/5/23 - Telephone call with Client re: HR corr. and response; Email to RL re: same	\$850.00	0.6	\$510.00
Review/Email 1/6/23 - Review TRO Response and Exhibits; Email to Client re: same (.1); Law Review research re: remote RA in post-secondary settings (1.0)	\$850.00	1	\$850.00
Prepare 1/9/23 - Prepare TRO Reply Brief	\$850.00	6.8	\$5,780.00
Prepare 1/10/23 - Prepare for conference with Judge re: TRO /Oral Argument (.8); Review, revise, edit TRO Reply Brief (4.5); prep notices of dep for JW, JP and LBA (.3)	\$850.00	5.6	\$4,760.00
Conference Call/Prepare/Attend/Telephone Call 1/11/23 - Prepare for status conference/oral argument (.6); Attend status conference with court (1.0); Telephone call with Atty Lamar re: JW/JP deposition preparation and related email correspondence (.2); Conference call with Client re: TRO issues and follow-up with doctor (1.2)	\$850.00	3	\$2,550.00
Telephone Calls/Email 1/13/23 - Telephone calls with Client re: doctor's letter and response to HR (.8); Extended to HR re: alternative RA (.3); Collaboration w/ Client re: response to HR (1.2)	\$850.00	2.3	\$1,955.00
Prepare 1/16/23 - Prepare for Weidman and Pena depositions	\$850.00	1.5	\$1,275.00
Prepare/Telephone Calls/Review 1/17/23 - Prepare case issues (1.2); Telephone calls with Atty Lamar re: deposition preparation and completing discovery (.5); Review/Annotate depositions and general preparation for upcoming depositions (2.5) Prepare RFPD3 (1.0)	\$850.00	5.1	\$4,335.00
Telephone Call/Email 1/18/23 - Telephone call with Client re: TRO and RA status (.4); Email to Judge re: Dr. Shah letter (.2); Collaborate w/ Client re: draft response to DSO (.3)	\$850.00	0.9	\$765.00
Prepare/Review/Email 1/19/23 - Prepare/update case issues and materials for JW deposition (2.3); Review Client docs to HR and prepare SED supplemental production (1.1); Email to RL re: dep prep for JW and JP (.4)	\$850.00	3.8	\$3,230.00
Emails/Telephone Call/Review 1/20/23 - Email to Client re: DSO update re: medical docs (.2); Telephone call with Atty Lamar re: deposition preparation (.3); Review discovery record and prepare outline for JW deposition (6.3) File review	\$850.00	10.5	\$8,925.00

and prepare exhibits for JW and JP depositions (3.1); Email to RL re: dep prep (.6)

Email/Telephone Call/Prepare 1/22/23 - Email to union re: LWOP expiration (.2); Telephone call with Client re: depositions and discovery (.4) Prepare for Weidman deposition (2.0); Telephone call w/ RL re: prep for Weidman dep and LWOP issue (.5)	\$850.00	3.1	\$2,635.00
Telephone Calls/Prepare/Attend 1/23/23 - Prepare for Weidman deposition (1.2); Attend Weidman deposition (4.0); Telephone call with Client re: JW deposition and follow-up (.5); Telephone call with Atty Lamar re: Pena deposition preparation (.4); Telephone call with Client and Atty Lamar re: Dr. Shah deposition (.3); Prepare deposition materials for Pena deposition (1.5); Telephone call w/ Client & RL re: TRO (.3)	\$850.00	7	\$5,950.00
Telephone Calls/Attend/Emails 1/24/23 - Telephone calls with Client re: Pena deposition and next steps (1.0); Attend Pena deposition (1.5); Email to Atty Lamar and Client re: Dr. Shah deposition preparation (.3); Email to Client w/ prep materials for dep (.2); Telephone calls with RL re: JP and Dr. Shah dep prep (.6)	\$850.00	3.6	\$3,060.00
Prepare 1/25/23 - Prepare materials for Client deposition preparation	\$850.00	2.5	\$2,125.00
Telephone Call/Prepare 1/27/23 - Telephone call with Client re: Dr. Shah deposition preparation (.7); Prepare Dr. Shah deposition preparation materials for Atty Lamar (1.8)	\$850.00	4.3	\$3,655.00
Email/Telephone Calls/Prepare 1/30/23 - Email to Counsel re: PPO letter (.2); Telephone calls with Atty Lamar re: Dr. Shah deposition fee and related issues/email re: same (.3); Prepare deposition preparation materials for Client	\$850.00	7.5	\$6,375.00
Telephone Call/Attend/Prepare 1/31/23 - Telephone call with Client re: deposition preparation (1.8); Attend zoom deposition of Dr. Shah (2.0); Prepare materials and issue summaries for Client deposition preparation (4.1)	\$850.00	7.9	\$6,715.00
Prepare 2/1/23 - Review/Prepare materials and outline for client deposition preparation	\$850.00	6.1	\$5,185.00
Telephone Call/Attend 2/2/23 - Telephone call with Client re: union LWOP advice/info (.5); 1st deposition preparation with client (6.0)	\$850.00	6.5	\$5,525.00
Prepare 2/3/23 - Prepare materials for Client deposition preparation and review add'l Client docs (6.3); Email to Client and RL re: summary of Telephone call w/ Union President re: LWOP (.3)	\$850.00	6.6	\$5,610.00
Email/Prepare 2/6/23 - Email to client re: KH deposition planning (.3); Prepare materials for Client deposition preparation (3.9)	\$850.00	4.2	\$3,570.00

Prepare/Attend 2/7/23 - Prepare outline for Client deposition preparation (1.0); Attend zoom meeting with Client re: deposition preparation (5.0); Review re-search and prepare materials for KH deposition preparation (2.2)	\$850.00	8.2	\$6,970.00
Prepare/Email/Telephone Call/Research 2/8/23 - Update case issues (1.0); Telephone call with Client re: deposition preparation (1.1); Annotate JW deposition (2.3); Prepare supplemental document production (.4); Email to Counsel re: follow-up discovery items (.4); Research dep prep re: interference claims and dep prep email to Client re: same (1.7); Review defendant's additional exhibits (.2)	\$850.00	7.1	\$6,035.00
Telephone Call/Attend/Review/Emails 2/9/23 - Attend Client deposition (5.5); File review & emails to Counsel re: discovery production closure and deposition exhibits (.4); Telephone call with Client re: deposition de-brief and plan for KH deposition (2.0)	\$850.00	7.9	\$6,715.00
Emails/Prepare 2/10/23 - Email to Counsel re: Dr. Shah materials (.3); Prepare notice of deposition for Dr. H (.2); Email to Client re: PASSHE policies re: remote RA's (.4)	\$850.00	0.9	\$765.00
Prepare 2/13/23 - Prepare general points/ideas for KH deposition and consult with Atty Foley re: same	\$850.00	2.3	\$1,955.00
Zoom Conference 2/14/23 - Zoom conference with Client and RL re: KH deposition preparation	\$850.00	1.2	\$1,020.00
Telephone Call/Prepare/Research 2/15/23 - Telephone call with Atty Lamar re: KH Dep prep (.3); Prepare notice of KH deposition (.2); Research re: retaliation/interference (.8)	\$850.00	1.3	\$1,105.00
Emails/Telephone Call 2/19/23 - Email to Client re: Settlement Options/Strategy/Numbers (1.4); Telephone call with RL re: same (.)	\$850.00	1.7	\$1,445.00
Email/Prepare/Review 2/22/23 - Email to Atty Lamar re: KU's Amended SED and witness ID (.3); Review and Annotate KH's first deposition and KH's first deposition transcript (3.3); Prepare for KH deposition (2.9); Review and send supplemental Doc. production (.4)	\$850.00	6.9	\$5,865.00
Prepare 2/23/23 - Prepare for KH deposition	\$850.00	4.8	\$4,080.00
Prepare/Attend/Telephone Calls 2/24/23 - Prepare for KH deposition (4.5); Attend deposition of KH (3.4); Telephone calls with Client and RL re: deposition recap and next steps (2.0)	\$850.00	9.9	\$8,415.00
Telephone Call 2/27/23 - Telephone call with Atty Lamar re: discovery issues and deposition recaps	\$850.00	0.5	\$425.00

Emails 3/15/23 - Emails to Client and RL re: Response to OAG's email re: Fall 2023	\$850.00	0.1	\$85.00
Prepare/Telephone Call 3/16/23 - Prepare draft response to OAG email re: Fall 2023 (.6); Telephone call to Client re: same (.5)	\$850.00	1.1	\$935.00
Email 3/20/23 - Email to Atty Lamar re: MSJ issues	\$850.00	0.3	\$255.00
Email/Telephone Call 3/23/23 - Email to Atty Lamar re: MSJ planning (.2); Telephone call with Client re: RA Response to OAG (.4)	\$850.00	0.6	\$510.00
Emails/Telephone Call 3/30/23 - Email to Atty Lamar re: MSJ issues (.4); Telephone call with Atty Lamar re: Medina's Response re: Fall RA (.6); Email to Client re: union grievance and OAG's latest email (.1)	\$850.00	1.1	\$935.00
Email 4/3/23 - Email to OAG re: Fall semester IAP issues	\$850.00	0.4	\$340.00
Email 4/5/23 - Email to OAG re: discovery issues	\$850.00	0.2	\$170.00
Email 4/7/23 - Email to Client re: MSJ plans	\$850.00	0.2	\$170.00
Prepare/Review/Attend 4/20/23 - Prepare objections to anticipated KU MSJ exhibits (1.2); Extensive file review and prepare draft appendix (3.3); Attended zoom interview with Donna S. (1.8)	\$850.00	6.3	\$5,355.00
Review/Prepare 4/24/23 - Review file and prepare appendix	\$850.00	4.6	\$3,910.00
Email/Prepare 4/25/23 - Email to Counsel re: RFA No. 1 (.4); Prepare MSJ appendix (5.2)	\$850.00	5.6	\$4,760.00
Prepare/Telephone Call 4/26/23 - Prepare MSJ appendix (5); Telephone call w/ RL re: MSJ and appendix prep (1.0)	\$850.00	6	\$5,100.00
Prepare 4/27/23 - Prepare Joint Statement of Undisputed Facts	\$850.00	4.8	\$4,080.00
Prepare 4/28/23 - Prepare Joint Statement of Undisputed Facts	\$850.00	5.2	\$4,420.00
Email/Prepare/Review/Revise/Edit 5/1/23 - Email to Counsel, Atty Lamar and client re: Appendix and MSJ process (.4); Prepare, review revise edit Appendix (4.0)	\$850.00	4.4	\$3,740.00

Prepare 5/2/23 - Prepare draft JSUF	\$850.00	5.1	\$4,335.00
Telephone Calls/Prepare/Review/Revise/Edit 5/3/23 - Telephone calls with Atty Lamar re: MSJ preparation (.7); Prepare, review, revise, edit proposed JSUF (5.2)	\$850.00	5.9	\$5,015.00
Email/Telephone Call 5/4/23 - Email to Client re: settlement strategy (.2); Telephone call w/ RL re: same (.5)	\$850.00	0.7	\$595.00
Email 5/5/23 - Email to Client re: settlement issues (.3); Draft JSUF (6.1)	\$850.00	6.4	\$5,440.00
Draft 5/8/23 - Draft JSUF	\$850.00	6.1	\$5,185.00
Prepare/Review/Revise/Edit 5/9/23 - Prepare, review, revise, edit draft JSUF	\$850.00	4.1	\$3,485.00
Prepare/Review/Revise/Edit 5/10/23 - Prepare, review, revise, edit draft JSUF	\$850.00	4.2	\$3,570.00
Prepare/Email 5/11/23 - Prepare JSUF (5.2); Email to Client & RL re: same and next steps (.4)	\$850.00	5.6	\$4,760.00
Telephone Call/Prepare 5/12/23 - Telephone call w/ RL re: JSUF Draft and MSJ issues (.3); Prep. appendix and Draft JSUF (5.0); Telephone call w/ RL re: MSJ issues (.2)	\$850.00	5.5	\$4,675.00
Prepare/Draft 5/15/23 - Prepare proposed Joint Appendix and TOC's (Vol I-VII) (5.1); Draft JSUF (2.1)	\$850.00	7.2	\$6,120.00
Prepare/Outline/Review 5/16/23 - Prepare/Outline MSJ brief (4.8); Review/Revise/Edit JSUF (1.0); Law Review research re: MSJ (2.5)	\$850.00	8.3	\$7,055.00
Telephone Call/Prepare 5/17/23 - Telephone call w/ OAG re; JSUF process (.4); Prepare MSJ Brief (6.5)	\$850.00	6.9	\$5,865.00
Prepare 5/23/23 - Prepare MSJ Brief	\$850.00	7.2	\$6,120.00
Telephone Calls/Prepare 5/24/23 - Telephone calls with Atty Lamar re: MSJ issues and draft memo (.5); Prepare MSJ Memo (9.0)	\$850.00	9.5	\$8,075.00
Prepare/Email 5/25/23 - Prepare MSJ Memo (10.2); Email to Client and RL re: status (.2)	\$850.00	10.4	\$8,840.00

Prepare/Review/Revise/Edit 5/26/23 - Prepare, review, revise, edit MSJ Brief	\$850.00	9.2	\$7,820.00
Prepare/Edit/Review/Revise 5/30/23 - Prepare/Edit/Review/Revise MSJ/JSUF	\$850.00	12	\$10,200.00
Prepare/Review/Revise/Edit 5/31/23 - Prepare, review, revise, edit MSJ Brief	\$850.00	6.2	\$5,270.00
Telephone Call/Prepare/Review/Revise/Edit/Email 6/1/23 - Telephone call with Counsel re: MSJ/JSUF prep and procedure (.3); Prepare, review, revise, edit MSJ (10.2); Telephone call with Atty Lamar re: MSJ procedure and Edits to Brief (.4); Email to Client re: MSJ Status (.2)	\$850.00	11.1	\$9,435.00
Review/Revise/Edit 6/2/23 - Review, revise, edit MSJ Brief (1.2); Review, Revise OAG's Response to JSUF, Part I (1.3)	\$850.00	2.5	\$2,125.00
Review/Revise/Edit 6/5/23 - Review, revise, edit JSUF Response/Edits to SJ citations (2.3); Review medical records re: KU denial of JSUF No. 6 (1.)	\$850.00	3.3	\$2,805.00
Review/Revise/Edit/Prepare 6/6/23 - Review, revise, edit Defendant's Response to JSUF (2.0); Prepare, edit, revise MSJ, Memo and corresponding law review re-search (14.0)	\$850.00	16	\$13,600.00
Telephone Call/Review/Revise/Edit 6/7/23 - Review, revise, edit JSUF revisions by defendants (4.0); Telephone call with Counsel re: same (.1); Edit, revise MSJ Brief (6.5)	\$850.00	10.6	\$9,010.00
Telephone Call/Review/Revise/Edit/Conference Call/Prepare 6/8/23 - Telephone call with Client re: MSJ issues and status (1.4); Conference call with Counsel re: JSUF revisions (3.8); Prepare, review, edit MSJ memo (1.1); Review, revise, edit JSUF (4.8)	\$850.00	11.1	\$9,435.00
Prepare/Review/Revise/Edit/Email 6/9/23 - Prepare, review, revise, edit MSJ (11.5); Email to RL re: MSJ issues (.3); Prepare plaintiff's JSUF (1.2)	\$850.00	13	\$11,050.00
Prepare/Review/Revise/Edit 6/11/23 - Prepare, review, revise, edit MSJ Brief (3.2); Review, revise JSUF (2.0); Edit, review Appendix TOC, prepare Appendix for filing, file Appendix on ECF (2.8)	\$850.00	8	\$6,800.00
Prepare, Review/Revise/Edit 6/12/23 - Prepare, review, revise, edit and finalize MSJ Memo	\$850.00	13	\$11,050.00
Review/Revise/Edit/Prepare 6/13/23 - Review, revise, edit and finalize JSUF and prepare for filing (2.0); Revise and finalize plaintiff's JSUF (1.0)	\$850.00	3	\$2,550.00
Telephone Call 6/16/23 - Telephone call with Atty Lamar re: MSJ	\$850.00	0.5	\$425.00

Telephone Call 6/30/23 - Telephone call with Atty Lamar re: status of MSJ and next steps	\$850.00	0.2	\$170.00
Telephone Calls/Emails 7/10/23 - Telephone call with RL re: PI status (.2); Telephone call with Client re: PI and MSJ issues and next steps (.9); Email to OAG re: Extending PI (.3); Email to Client & RL re: same(.3)	\$850.00	1.7	\$1,445.00
Email 7/11/23 - Email to OAG re: Fall 2023 RA	\$850.00	0.3	\$255.00
Telephone Call 7/12/23 - Telephone call with Counsel re: PI extension	\$850.00	0.1	\$85.00
Telephone Calls/Research/Email 7/14/23 - Telephone call with Counsel re: PI extension and stipulation re: MSJ response extension (.2); Telephone call with Client re: PI/MSJ issues and settlement protocols (2.0 N/C); Telephone call with Atty Lamar re: same (.6); Research re: PI extensions and Appeal issues (2.6); Email to Atty Lamar re: same (.2)	\$850.00	3.6	\$3,060.00
Prepare 7/17/23 - Prepare Motion to Extend PI	\$850.00	2.7	\$2,295.00
Telephone Conference/Telephone Calls 7/18/23 - Telephone Conference with Court and Counsel re: Motion to Extend PI (.5); Telephone call with Client re: status and next steps re: PI and MSJ (1.4); Telephone calls with Atty Lamar re: same (1.1)	\$850.00	3	\$2,550.00
Emails 7/19/23 - Email to Atty Lamar re: updated letter from Dr. Shah; Emails to Client and RL re: medical documentation (.3)	\$850.00	0.3	\$255.00
Telephone Calls/Email/Prepare 7/20/23 - Telephone call with Client re: PI Order and next steps (.6); Draft correspondence to Judge S re: PI and defendant's demand for expert discovery (1.3); Telephone call with Atty Lamar re: same (.2); Email to Counsel re: Dr.S' letter and expert issue (.3)	\$850.00	2.4	\$2,040.00
Correspondence/Telephone Calls/Email 7/21/23 - Correspondence to Judge S re: updated Dr. S's letter and Stipulation re: Fall 2023 (.4); Telephone call with Client re: PI Order and next steps (1.0); Telephone call with Atty Lamar re: same (.2); Email to client re: letter to Judge S and scope of PI Order (.2)	\$850.00	1.8	\$1,530.00
Telephone Calls 7/24/23 - Telephone call with Client re: PI Order and MSJ process (1.1); Telephone call with Atty Lamar re: same (.2); Email to Client re: same and implications going forward (.1)	\$850.00	1.4	\$1,190.00
Telephone Call 7/25/23 - Telephone call with Client re: Oross Recon decision and implications for client's MSJ	\$850.00	1	\$850.00
Email	\$850.00	0.4	\$340.00

Prepare 8/10/23 - Prepare TOC for OAG with ECF annotations (4.1 N/C)	\$850.00	0	\$0.00
Telephone Call/Prepare 8/11/23 - Telephone call with Client re: preparation for Response to MSJ and procedural issues (1.3); Prepare annotated Appendix TOC (3.2 N/C)	\$850.00	1.3	\$1,105.00
Prepare/Review/Telephone Call/Email 8/14/23 - Prepare draft response to KU-SUF (3.3); Review defendant's MSJ and related filings; prepare outline for response (2.2); Telephone call with Atty Lamar re: same (.3); Email to RL re: MSJ issues/arguments (.2)	\$850.00	6	\$5,100.00
Prepare 8/15/23 - Prepare Response to Defendant's Supplemental facts	\$850.00	1	\$850.00
Prepare/Research/Email 8/16/23 - Prepare response to defendant's MSJ/Additional Facts and KU Response to Plaintiff's Supplemental Facts (1.3); Research/read cases cited by KU re: disparate impact (3.0); Email to OAG re: Exhibit Filing (.1)	\$850.00	4.4	\$3,740.00
Prepare 8/22/23 - Prepare response to KU - MSJ/KU-SUF	\$850.00	5.8	\$4,930.00
Email/Prepare 8/23/23 - Email to Client re: RA issue (.2); Prepare Response to KU-MSJ (4.2)	\$850.00	4.4	\$3,740.00
Prepare/Review/Revise/Edit 8/24/23 - Prepare, review, revise, edit Response to KU-MSJ	\$850.00	9.3	\$7,905.00
Prepare/Review/Revise/Edit 8/25/23 - Prepare, review, revise, edit Response to KU MSJ	\$850.00	7.2	\$6,120.00
Prepare 8/28/23 - Prepare Response to KU-MSJ	\$850.00	5.3	\$4,505.00
Prepare/Email 8/29/23 - Prepare Response to KU-MSJ (6.2); Email to RL re: research support (Scope of Plaintiff's MSJ's record) (.2)	\$850.00	6.4	\$5,440.00
Prepare/Review/Revise/Edit/Telephone Call 8/30/23 - Prepare, review, edit Response to KU-MSJ/KU-SUF (14.0); Telephone call with Atty Lamar re: same (.5)	\$850.00	14.5	\$12,325.00
Prepare/Review/Revise/Edit 8/31/23 - Prepare Response to KU-SUF & Review, Revise, Edit (5.5); Prepare, Revise, Review, Edit MSJ Response Brief (6.3); Prepare motion to file excess pages (.2)	\$850.00	12	\$10,200.00
Telephone Calls/Research/Email	\$850.00	1.5	\$1,275.00



9/14/23 - Telephone calls with Atty Lamar re: response to KU's email re: expert disclosure (.3); Research disclosure rule and file review; email to Atty Lamar re: proposed response to defendant's disclosure email (1.0); Telephone call with RL re: same (.2)

Review/Respond/Email 9/19/23 - Review and Respond to RL email re: individual capacity claims and LEXIS attachment (NC)	\$850.00	0	\$0.00
Review/Emails 9/28/23 - Review KU's Expert Report (.3); Email to Client & RL re: Evaluation of same (.4); Email to OAG re: Expert Discovery (.3)	\$850.00	1	\$850.00
Email 10/5/23- Email to counsel re: Expert Report issue and Rule 26 (f) MSJ/Expert Schedule	\$850.00	0.3	\$255.00
Telephone Call 10/11/23- Telephone call with RL re: Response to KU's letter to Judge re: Expert Report (.3); Email to client re: same (.3)	\$850.00	0.6	\$510.00
Email 10/13/23 - Email to Client re: KU's Expert Report and MSJ	\$850.00	0.2	\$170.00
Prepare 10/12/23- Prepare letter to Judge re: KU's communication with Court re: Filing Expert Report in MSJ record	\$850.00	1.5	\$1,275.00
Telephone Call 10/19/23- Telephone call with Client re: PI issues and correspondence with court	\$850.00	0.6	\$510.00
Telephone Call 10/27/23- Telephone call with Ralph L re: status conf.	\$850.00	0.2	\$170.00
Sealed Conference Call/Telephone Calls 10/30/23 - Status conference with Court and Counsel re: PI and MSJ Issues (.5); Telephone calls with RL re: prepare for and review of status conference (.3); Telephone call with Client re: PI Issue and settlement options (1.7)	\$850.00	2.5	\$2,125.00
Telephone Call 11/1/23-Telephone call with Ralph L re: Judge's new discovery order	\$850.00	0.4	\$340.00
Other 11/2/23- Consult re: possible expert re: remote RA's/disability access (NC)	\$850.00	0	\$0.00
Telephone Call 11/6/23- Telephone call with outside counsel re: disability access expert	\$850.00	0.5	\$425.00
Telephone Call 12/1/23- Telephone calls with Client re: update, status, and next steps	\$850.00	2	\$1,700.00

Telephone Call 12/7/23- Telephone call with Ralph L re: Extensive DBA corr re: Fall 2024 re: RA "re-visit"	\$850.00	0.4	\$340.00
Email/Telephone Call 12/8/23- Email to Counsel re: RA for Fall 2024 (.5); Telephone call with client re: same (.6)	\$850.00	1.1	\$935.00
Email 12/14/23 - Email to Client re: Fall 2024 HR Corr. and next steps	\$850.00	0.2	\$170.00
Email/Telephone Call 1/9/24- Telephone call with Client re: RTW Release and next steps (.7); Emails to Counsel and Client re: same (.3); Telephone call with RL re: RTW issues (.3)	\$850.00	1.3	\$1,105.00
Telephone Call/Email 1/12/24- Telephone call with Client re: RTW denial (.1); Email to Counsel re: same (.3)	\$850.00	0.4	\$340.00
Telephone Call 1/17/24- Telephone call with KRB re: Client's reinstatement issues (.2); Telephone calls with Client re: same (1.4)	\$850.00	1.6	\$1,360.00
Telephone Call/Prepare 1/18/24- Telephone call with Counsel re: reinstatement issue (.2); Prepare letter to Judge re: reinstatement issue (1.1); Telephone call with Client re: reinstatement issues and letter to Judge (1.0)	\$850.00	2.3	\$1,955.00
Telephone Call/Email 1/22/24- Email to Counsel re: reinstatement options (.2) Status conference with Court and Counsel re: RTW status and next steps (.3); Telephone call with Client re: status conf. and RTW issues (.6)	\$850.00	1.1	\$935.00
Telephone Calls 1/25/24 - Telephone call with RL re: settlement (.1); Telephone call with Judge L. re: settlement (.5)	\$850.00	0.6	\$510.00
Telephone Call/Prepare 1/26/24- Telephone call with Client re: settlement (.6); Prepare for status conference/settlement issues (.3); Telephone call with Client re: conference re: RTW status (.5)	\$850.00	1.4	\$1,190.00
Telephone Call/Prepare 2/7/24- Prepare outline for settlement; back pay-review fees/costs (2.2); Telephone call with Client re: same and reinstatement (1.1)	\$850.00	3.3	\$2,805.00
Email/Telephone Calls/Prepare 2/8/24- Email to Counsel re: reinstatement issue (.4); Telephone calls with Client re: back pay and reinstatement (1.5); Prepare back pay and other settlement elements for discussion with Client (1.8); Email to Client re: response to HR com. and medical doc. needed (.4); Telephone call with RL re: LWOP status and settlement (.4)	\$850.00	4.5	\$3,825.00
Email 2/9/24- Email to Client re: Dr. Shah letter	\$850.00	0.1	\$85.00

Review/Revise/Edit/Email 2/12/24 - Review, revise & edit Response to JW & relayed email communications (1.6); Telephone call with Client re: reinstatement/8-wk Classes & Email to Counsel re: same (.2)	\$850.00	1.8	\$1,530.00
Telephone Call/Prepare 2/13/24 - Prepare Responses to KU Supp MSJ Brief (8.4); Telephone Call with RL re: Same (.2)	\$850.00	8.6	\$7,310.00
Prepare 2/14/24 - Prepare Response to KU Supp MSJ	\$850.00	6.8	\$5,780.00
Prepare/Review/Revise/Edit 2/15/24 - Prepare, review, revise & edit Response to changes to Supp MSJ Brief	\$850.00	7.5	\$6,375.00
Prepare/Review/Revise/Edit/Telephone Call 2/16/24 - Prepare, review, revise & edit Response to Supp'l MSJ Brief and prepare for filing (4.1); Telephone call w/ Client re: same (.1)	\$850.00	4.2	\$3,570.00
Emails/Telephone Call 2/19/24 - Email to Client re: Settlement Options/Strategy/Numbers (1.4); Telephone call w/ RL re: same (.3); Emails to Client re: Medical Info for Spring Semester (.3)	\$850.00	2	\$1,700.00
Emails 2/20/24 - Emails to Clerk's Office re: Attachments/MSJ Vol IX (N/C)	\$850.00	0	\$0.00
Telephone Call 2/26/24 - Telephone call w/ Client re: Reinstatement issues	\$850.00	0.4	\$340.00
Email 2/28/24 - Email w/ Counsel re: Payroll status	\$850.00	0.1	\$85.00
Email 3/1/24 - Emails to Counsel & Client re: CG's payroll status	\$850.00	0.3	\$255.00
Email 3/12/24 - Email to Counsel re: CG's payroll status	\$850.00	0.2	\$170.00
Telephone Call 3/14/24 - Telephone call with Counsel re: Client's payroll status	\$850.00	0.1	\$85.00
Emails/Telephone Calls 3/15/24 - Emails/Correspondence to Counsel re: CG's payroll status (.1); Telephone call with RL re: CG payroll status (.2); Telephone call with Client re: same (.3)	\$850.00	0.6	\$510.00
Review/Email 3/16/24 - Review KU correspondence with HR re: payroll status & email to Client re: same	\$850.00	0.2	\$170.00
Telephone Call 3/22/24 - Telephone call with RL re: ongoing payroll issues and case status	\$850.00	0.2	\$170.00

Telephone Calls/Review 3/27/24 - Telephone call with Client re: Court decision (.2); Telephone call with RL re: Court decision & next steps (.5); Review Court decision (.4)	\$850.00	1.1	\$935.00
Status Conference Call/Telephone Call 3/28/24 - Status conference call with Court re: Final Disposition (.2); Telephone call with Client re: same (.2); Email to OAG re: mediation status (.1)	\$850.00	0.5	\$425.00
Emails 3/29/24 - Emails with Client and Union re: ongoing issues re: Covid teaching RA's	\$850.00	0.2	\$170.00
Review 4/11/24 - Analyze and edit KU Excel and Client re: back pay analysis; Emails to Client re: same	\$850.00	1	\$850.00
Telephone Calls/Research 4/23/24 - Telephone call with OAG re: Backpay, prep for status call with Court and final resolution of claims (.3); Research 3rd Cir. Cases re: CLS Fee Schedules (1.0); Telephone call with RL re: law, strategy and planning for fee petition (.6)	\$850.00	1.9	\$1,615.00
Telephone Call 4/26/24 - Telephone call with Court re: Status/Back Pay	\$850.00	0.3	\$255.00
Telephone Call/Research 5/4/24 - Telephone call with Client re: Back Pay issues/calculations/make whole remedies and effectuation re: Lost time and retirement (1.0); Research re: Statutory Interest (1.0); Email to client and RL re: same (.5)	\$850.00	2.5	\$2,125.00
Telephone Call/Research/Email 5/15/24 - Telephone call with RL re: back pay finalization/reconciliation and next steps (.3); Email RL and Client re: same (.5); Research re: Statutory Interest (1.2)	\$850.00	2	\$1,700.00
Email 5/19/24 - Email to Client re: payroll status	\$850.00	0.1	\$85.00
Telephone Calls 5/31/24 - Telephone calls with Client re: Back pay numbers/process for finalization of back pay calculations	\$850.00	1.2	\$1,020.00
Prepare 6/3/24 - Prepare back pay calculations (1.5); email to client re: same (.6)	\$850.00	2.1	\$1,785.00
Telephone Conference Call/Prepare/Review/Revise/Edit/Email 6/4/24 - Telephone call w/ Client & Counsel re: Prep for Final Order (50%) (.2); Prepare, review, revise, edit back pay analysis; Emails to Client re: same (5.8)	\$850.00	6	\$5,100.00
Prepare/Emails/Telephone Call	\$850.00	1.2	\$1,020.00

6/5/24 - Prepare back pay calculations and Emails to client re: same (.3); Telephone call with RL re: Fee motion and time sheets (.9)

Emails/Prepare/Review/Revise/Edit 6/6/24 - Emails and Telephone call with Client re: same (1.1); Prepare, review, revise, edit Back pay calculations and draft report	\$850.00	5.3	\$4,505.00
Email 6/11/24 - Emails to Client re: mediation correspondence from Judge Straw and Scheduling	\$850.00	0.3	\$255.00
Review/Revise/Edit/Emails 6/13/24 - Review, revise, edit RL Fee affidavit and E-mail re: same (.5); Emails to RL re: prep/support for fee petition; Emails to OAG/Client/Court re: mediation status (1.5)	\$850.00	2	\$1,700.00
Telephone Call/Prepare/Email 6/18/24 - Telephone call w/ Counsel re: Back pay calculations and Final Order prep (.7); Prepared Slips for extension of Joint Rep and Corr/ to Court (.5); Email to Client re: status conf. recap (.2)	\$850.00	1.4	\$1,190.00
Telephone Call/Emails 6/19/24 - Telephone call w/ RL re: Time sheets/fee petition/recaps of status conference and meeting w/ OAG re: Final Order (.6); Emails to Client re: back pay issues (.2); Email to RL re: fee petition/timesheets (.2)	\$850.00	1	\$850.00
Telephone Call 6/26/24 - Telephone call with Client re: Back pay and final order/joint report prep	\$850.00	0.9	\$765.00
Telephone Call/Email/Review/Prepare 7/1/24 - Telephone call with OAG re: Joint Report/Calculations (.3); Email to OAG re: Request for Extension (.2); Client doc and analysis; extensive Email corr. re: pecuniary loss and Emails to OAG re: same (2.3); Prepare draft Report (1.3)	\$850.00	4.1	\$3,485.00
Email/Prepare/Review/Revise/Edit/Research 7/2/24 - Email to OAG and Client re: Docs re: non-back pay issues (.4); Prepare Motion to Dissolve PI & Refund Bond (.5); Review, revise, edit Draft Joint Report (.4); Research re: tax brackets and gross-up back pay remedy (2.3) (NC)	\$850.00	1.3	\$1,105.00
Emails/Review/Revise/Edit/Telephone Calls/Research/Draft 7/3/24 - Emails to Client re: make whole issues and pecuniary losses (.4); Review, revise, edit back pay Calculations and draft report(s) (.7); Research re: back pay gross-up (1.3) (NC); Telephone call with OAG re: prep of Joint Report (.2); Draft Client declaration re: tax gross-up and emails to Client re: same (.8) (NC)	\$850.00	1.3	\$1,105.00
Telephone Calls/Review/Revise/Edit 7/8/24 - Telephone calls with Client re: preparing damage docs and status of joint report (1.0); Review, revise, edit Joint Report/Final Edits (1.6); Telephone calls with OAG re: same (.2)	\$850.00	2.8	\$2,380.00
Emails/Review/Revise/Edit 7/9/24 - Emails to OAG and Clients re: LWOP/Confirmation of sick leave restoration (.3); Review, revise, edit Bill of Costs (1.3)	\$850.00	1.6	\$1,360.00

Emails 7/10/24 - Email to Client re: confirmation of retroactive seniority (.3); Email to RL re: reconciliation of time sheets (.2)	\$850.00	0.5	\$425.00
Review/Revise/Edit 7/12/24 - Review, revise, edit Reconcile 2023-2024 time sheets with corresponding Review of Email record	\$850.00	2.9	\$2,465.00
Prepare/Review/Revise/Edit 7/15/24 - Prepare, review, revise, edit CV; LEXIS Research re: citations	\$850.00	5.1	\$4,335.00
Review/Revise/Edit 7/17/24 - Review, revise, edit CV for fee petition/internet research re: same	\$850.00	1.8	\$1,530.00
Prepare/Review/Revise/Edit 7/18/24 - Prepare, review, revise, edit Fee Declaration	\$850.00	4.1	\$3,485.00
Prepare/Review/Revise/Edit 7/19/24 - Prepare, review, revise & edit Fee Declaration (NC)	\$850.00	0	\$0.00
Prepare/Review/Revise/Edit 7/26/24 - Prepare, review, revise, edit/Re-organize Fee Declaration	\$850.00	2.5	\$2,125.00
Prepare/Review/Revise/Edit 7/29/24 - Prepare/Review/Revise/Edit Fee Declaration	\$850.00	1.5	\$1,275.00
Emails/Review/Revise/Edit 7/30/24 - Emails with Clerk's Office and Client re: Bond Refund (.3); Review/Revise/Edit: CV (1.8)	\$850.00	2.1	\$1,785.00
Email/Prepare/Review/Revise/Edit 7/30/24 - Email with Clerk's Office and Client re: Bond Refund (.2); Prepare/Review/Revise/Edit CV/Cite Checks (2.9)	\$850.00	3.1	\$2,635.00
Review/Revise/Edit/Finalize/Prepare 8/1/24 - Review/Revise/Edit/Finalize CV for Fee Petition and Cite Checks (LEXIS) (3.5); Prepare/Edit/Review/Revise Declaration (LM) (1.8) (NC)	\$850.00	3.5	\$2,975.00
Prepare 9/5/24 - Prepare Draft Motion for Final Order	\$850.00	2	\$1,700.00
Telephone Calls/Prepare/Review/Revise/Edit 9/6/24 - Telephone call with RL re: Final Order issues (.4); Telephone call with Client re: same (1.0); Prepare, review, revise, edit re: Final Order and Memo of Law (4.5)	\$850.00	5.9	\$5,015.00
Prepare/Review/Revise/Edit 9/9/24 - Prepare, review, revise, edit Motion for Final Order and corre- sponding research and file review	\$850.00	6.5	\$5,525.00
Prepare/Review/Revise/Edit/Telephone Call 9/10/24 - Prepare, review, revise & edit Motion for Final Order/Prepare for filing (4.5); Telephone call with RL re: same (.3)	\$850.00	4.8	\$4,080.00

Telephone Call 9/12/24 - Telephone call with Client re: Final Order and related issues	\$850.00	1	\$850.00
Email 10/2/24 - Email to Client re: Status Conference Summary (both cases)	\$850.00	0.5	\$425.00
Prepare/Draft 10/23/24 - Prepare Draft response re: KU Response to MFFO	\$850.00	3.5	\$2,975.00
Telephone Call/Prepare 10/24/24 - Telephone call with RL re: Reply Brief MFFO (.6); Prepare Reply Brief (5.9)	\$850.00	6.5	\$5,525.00
Prepare/Review/Revise/Edit 10/25/24 - Prepare, review, revise and edit Reply Brief (9.2); Prepare Declaration re; economic losses (1.4)	\$850.00	10.6	\$9,010.00
Review/Edit 10/26/24 - L. Rev. Research; Review and edit Reply Brief re: injunctive remedies	\$850.00	0.8	\$680.00
Telephone Call/Review/Revise/Edit 10/27/24 - Telephone call with Client re: Declaration (1.0); Review, revise, & edit Reply Brief (1.8)	\$850.00	2.8	\$2,380.00
Review/Revise/Edit/Finalize 10/28/24 - Review, revise, edit & finalize Reply Brief and Appendix	\$850.00	3	\$2,550.00
Email/Correspondence 11/8/24 - Email and correspondence to Client re: review of KU Revised ADA forms; Internet research re: release of doctor for RA request	\$850.00	0.8	\$680.00
Email/Correspondence 11/12/24 - Email and correspondence to Client re: MFFO Declaration	\$850.00	0.1	\$85.00
Email/Correspondence/Prepare/Review/Revise/Edit 1/21/25 - Email and correspondence to Client re: Final Order (.4); Prepare fee memo (1.3); Review, revise and edit Declaration; review status and summer work product re: fee petition (3.0)	\$850.00	4.7	\$3,995.00
Telephone/Conf. Call/Prepare 1/22/25 - Telephone call with RL re: Fee petition prep (.6); prepare fee brief and index time sheets for summary/reasonableness analysis (5.0)	\$850.00	5.6	\$4,760.00
Review/Revise/Edit 1/30/25 - Review, revise and edit Invoice/Billing Judgment review	\$850.00	1.2	\$1,020.00
Prepare/Review/Revise/Edit 2/1/25 - Prepare Index of Fee Invoice and outline Fee Brief (2.1); Review, revise, edit Appendix Doc and general preparation of Fee Petition (2.5)	\$850.00	4.6	\$3,910.00
Prepare 2/2/25 - Prepare Fee Petition/Memo and corresponding Cross-Reference to Invoice and Cross Invoice	\$850.00	8.7	\$7,395.00

\$5,695.00

\$829,600.00

Thank you!



**INDEX TO McKINLEY & RYAN INVOICE<sup>1</sup>**

<b>Intake/initial file review/consultation initial research and Case Evaluation</b>	12/16-12/27/2021	2.9
<b>Assisting Client with IAP and early settlement efforts</b>	01/5-92/01/2022	16.2
<b>Complaint preparation, including background work, research, consultation with Client and others re: factual background and litigation strategy, and draft/edit/finalize Complaint and initial status conference</b>	02/02-03/17/2022	33
<b>Activities related to Fall, 2022 and post- Complaint Dispute About the Adequacy of Medical Documentation for RA Request</b>	03/23-05/16/2022	14.7
<b>Activities related to preparation and planning for discovery</b>	05/06-06/15/2022	3.3
<b>Settlement Process with Judge Lloret</b>	06/22-08/04/2022	18.8
<b>Activities Pertaining to First Motion for TRO and Early Discovery Phase</b>	08/05-22/2022	66.5
<b>Execution of discovery plan and completion of discovery</b>	08/23-02/27/23 01/10 -	197.3
<b>Activities In Connection with LWOP and Second Motion for TRO</b>	12/15- 01/22/2023	38.8
<b>Activities Associated with KU's Alternative RA</b>	12/21/2022-01/18/2023	4

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<sup>1</sup> The purpose of this index to the McKinley & Ryan, LLC invoice is to show in general terms how Ms. McKinley spent her time by way of basic category and chronology. These are general summaries to assist the Court given the expansive time period encompassed in the invoice and the length of the document. Because of the nature and integration across categories, it is not entirely feasible to segregate every specific activity, some of which could arguably belong in more than one. All the specific entries for which Ms. McKinley is seeking compensation are set forth on the invoice, which has been adjusted as a matter of billing judgment. The omission of any of specific entry on the time sheet into this summary index does not constitute a waiver.

<b>Assist Client with RA for Fall, 2023</b>	03/15-04/23/2023	3.3
<b>Activities Related to Planning, Preparing, and finalizing Plaintiff's Motion for Summary Judgment, Statement of Undisputed Facts and MSJ Appendix</b>	03/23/2023-06/30/2023	260.5
<b>Activities Pertaining to Motion to Extend PI</b>	07/10/-08/10/2023	17.7
<b>Activities Related to Review, Evaluation and Response to KU MSJ</b>	08/11-31/2023	77.6
<b>Activities Pertaining to KU Expert Disclosure and Effort to Expand MSJ Record and New Discovery Order</b>	09/14-11/06/2023	9.9
<b>Update Telephone Conference with Client and Evaluation and Response to KU's Proposed Alternative RA for Fall, 2024</b>	12/01/-12/08/2023	3.7
<b>Activities Pertaining to Plaintiff's Release to Return to Work and KU's Response/Refusal</b>	01/09-03/22/2024	16.2
<b>Ongoing Settlement Process with Judge Lloret</b>	01/25-02/08/2024	5.3
<b>Activities Re: KU's Supplemental MSJ and Response</b>	02/13-02/16/2024	27.1
<b>Activities Related to Planning, Preparation &amp; Collaboration re: Undisputed Elements of Economic Relief</b>	03/27/-07/10/2024	37.1
<b>Activities Pertaining to Motion for Final Order</b>	09/05/24-09/12/24	20.2
<b>Activities Pertaining to Reply to KU Response to Motion for Final Order</b>	10/23-10/28/2024	27.9
<b>Planning, Research &amp; Preparation of Fee Petition</b>	06/13- 08/01/24	30.3
	01/21-02/03/2025	31.5

DATE: February 4, 2025